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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO
individually and on behalf of all similarly
situated,

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**STIPULATION AND [PROPOSED]
ORDER RE: LEAVE TO FILE FOURTH
AMENDED COMPLAINT**

The Honorable Yvonne Gonzalez Rogers

1 This stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively
2 referred to as the “Parties.”

3 WHEREAS, at the February 14, 2023 Case Management Conference, the Court asked
4 Plaintiffs to clarify which remedies they seek for each claim. Feb. 14, 2023 Tr. 52:16-18;

5 WHEREAS, to provide that clarification, Plaintiffs have prepared a Fourth Amended
6 Complaint, which solely amends the Prayer for Relief to clarify which remedies apply to each claim;

7 WHEREAS, Plaintiffs seek leave to file that Fourth Amended Complaint, attached hereto as
8 Exhibit A. A redline comparing the Third Amended Complaint to the Fourth Amended Complaint
9 is attached hereto as Exhibit B;

10 WHEREAS, Google reserves its rights to challenge the availability of the remedies Plaintiffs
11 seek, but does not object to the amendment.

12 NOW THEREFORE, the Parties stipulate that Plaintiffs may file their proposed Fourth
13 Amended Complaint.

14
15 DATED: February 28, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

17 By /s/ Andrew H. Schapiro

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Attorneys for Plaintiffs

ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Regarding Leave to file Fourth Amended Complaint. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document.

Dated: February 28, 2023

By /s/ Amanda Bonn

Amanda Bonn

Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the parties, the Court hereby **ORDERS:** Plaintiffs' request for leave to file their Fourth Amended Complaint is GRANTED. The Fourth Amended Complaint (attached as Exhibit A) shall be deemed filed as of the date of this Order.

IT IS SO ORDERED.

DATED: _____, 2023

Hon. Yvonne Gonzalez Rogers
United States District Judge